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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 KING ISAAC UMOREN,

15 Defendant.

Case No. 2:19-cr-00064-APG-NJK

**DEFENDANT'S SEALED EX-
PARTE MOTION TO WITHDRAW
AS COUNSEL AND REQUEST FOR
APPOINTMENT OF CONFLICT-
FREE COUNSEL**

16
17 On behalf of the Defendant, King Isaac Umoren, Assistant Federal Public Defender
18 Margaret Wightman Lambrose hereby files this Ex-parte Motion to Withdraw as Counsel and
19 Request for Appointment of Conflict-Free Counsel, and states the following:

20 1. The court appointed the Federal Public Defender's Office to represent Mr.
21 Umoren on October 22, 2019. ECF No. 34.

22 2. Jury trial in this matter is currently scheduled for April 20, 2020 at 9:00 a.m.
23 ECF No. 37. Pretrial motions are due on February 21, 2020. *Id.* Responses to the
24 government's motions for interlocutory order of sale are due on January 31, 2020. ECF No.
25 53.
26

1 3. On approximately January 14, 2020, the Office of the Federal Public Defender
2 learned of a conflict of interest in continuing to represent Mr. Umoren. The conflict of interest
3 has been investigated, researched, and confirmed internally before the filing of this motion.

4 4. Because of the conflict of interest, undersigned counsel moves to withdraw
5 immediately as counsel of record. In addition, undersigned counsel requests the immediate
6 appointment of independent, conflict-free counsel for Mr. Umoren.

7 5. A copy of this motion is being mailed to Mr. Umoren today as required by the
8 local rules. LR IA 10-6(b).

9 Memorandum of Points and Authorities

10 Attorneys practicing in the District of Nevada are required to comply with the State of
11 Nevada's standards of professional conduct. *See* LR IA 10-7.

12 A direct conflict of interest has arisen in this matter regarding the continued
13 representation of Mr. Umoren. The conflict prevents undersigned counsel and the Office of
14 the Federal Public Defender of Nevada from providing zealous, conflict-free representation
15 during all stages of Mr. Umoren's criminal proceedings.

16 In light of the ethical concerns raised by this conflict of interest, undersigned counsel
17 requests permission to withdraw as counsel of record and further requests the immediate
18 appointment of independent, conflict-free counsel for Mr. Umoren.

19
20 DATED this 17th day of January, 2020

21 Respectfully submitted,
22 RENE L. VALLADARES
23 Federal Public Defender

24 By: /s/ Margaret Wightman Lambrose
25 Margaret Wightman Lambrose
26 Assistant Federal Public Defender